

Statement from Bishop's Tachbrook Parish Council relating to the Matters and Issues identified by the Inspector.**Represented by Councillor Ray Bullen Dipl. Arch RIBA.****Matter 7a – Proposed housing site allocations and safeguarded land -Warwick, Whitnash and Leamington****Issue**

Whether the proposed housing site allocations and safeguarded land at Warwick, Whitnash and Leamington are justified, effective and consistent with national policy.

Policies DS11, DS15 and DS NEW2**Questions**

Taking each of the following proposed housing site allocations individually:

Urban Brownfield

• H02 (part) – Former sewage works, south of Harbury Lane

1) *What is the current planning status of the site?*

In the draft local plan as a strategic site but no planning application has yet been made.

2) *How does it fit within the overall spatial strategy?*

Poorly, because the FOAN for Warwick District (8,054) has already been met by the 9,978 sites given planning permission so far and this site is in the wrong place and is too remote to serve any useful purpose to meet Coventry's unmet need.

3) *In addition to housing provision, are there other benefits that the proposed development would bring?*

The site is only allocated for housing, all infrastructure being located on adjacent sites. There is a road link between the Lower Heathcote and Grove Farm housing sites.

4) *What are the potential adverse impacts of developing the site? How could they be mitigated?*

a) The site is wrongly described as brownfield. It is a former Sewage works that consisted of a number of below ground tanks that have long been disused. It was surrounded by open countryside when it was in use and since it ceased functioning, has reverted back to open countryside with no visible part of the works remaining.

b) It is a significant part of the north bank of the Tach Brook valley, the landscape assessment of which is of high sensitivity with long distant views to the south from the site and to the site from the south.

- c) Its southern boundary will abut the proposed country park where it is only about 150m width constrained by the Tach Brook to the south. The brook is about 5m wide, about a metre deep and fast flowing, flooding over its banks in periods of heavy rainfall. The brook discharges into the Avon south of Warwick Castle and it supports a range of wildlife including deer, heron and various birds of prey. The country park is located on the brook's northern bank where it is relatively steep with the proposed housing site north of this on a less steep bank.
- d) The site has a substantial stand of mature native trees between it and Heathcote Park with hedgerows and bushes contributing to the quality landscape of the Tachbrook Valley as shown in this photo.



Because planning permissions have already been granted for more dwelling sites than Warwick District needs to meet the 2014 household projection and this site is too far from Coventry to serve a useful service to 2014 household projection for the city, there is no need to retain it in the local plan in DS11 and it should be included in the country Park as it is in a location where the country park needs reinforcement.

The site should be regarded, in relation to NPPF17 Core Planning principles point 8 *that planning should encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value.* The Parish council considers that the site is of high environmental value and is a case that meets the level of environmental value that should be retained unless there are compelling reasons to make it necessary not to do so. Given that the need for this site for housing has disappeared there is no case to continue to include it in the local plan.

- 5) *What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?*

The former large sewage tanks remain below ground and the site would need very considerable clearing and cleaning before any construction could take place. This puts the viability of the site in question.

- 6) *Is the site realistically viable and deliverable?*
For the reason stated in 5) it is doubtful.
- 7) *What is the expected timescale for development and is this realistic?*
Does not yet have one.

• **H10 – Station approach, Leamington**

- 1) *What is the current planning status of the site?*
Planning permission for 212 dwellings was granted on 4th February 2016. Part of the site is currently used as a bus depot that has to be cleared by relocation. Work on constructing the replacement bus garage has commenced.
- 2) *How does it fit within the overall spatial strategy?*
Satisfactorily
- 3) *In addition to housing provision, are there other benefits that the proposed development would bring?*
The whole site is affordable housing for a housing association. It includes some essential parking for the adjacent Leamington Station.
- 4) *What are the potential adverse impacts of developing the site? How could they be mitigated?*
None.
- 5) *What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?*
No
- 6) *Is the site realistically viable and deliverable?*
Yes
- 7) *What is the expected timescale for development and is this realistic?*
Expected to complete within the next 5 years.

• **H11 – Land at Montague Road**

- 1) *What is the current planning status of the site?*
Site is available – in the SHLAA - and is in the MDLP as site H11. It is an urban site in public ownership on which the existing use has terminated.
- 2) *How does it fit within the overall spatial strategy?*
It is in a residential area in Warwick.
- 3) *In addition to housing provision, are there other benefits that the proposed development would bring?*
Not known

- 4) *What are the potential adverse impacts of developing the site? How could they be mitigated?*
None known
- 5) *What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?*
None known
- 6) *Is the site realistically viable and deliverable?*
It would appear so.
- 7) *What is the expected timescale for development and is this realistic?*
Not known.

• **H13 – Soans site, Sydenham Drive**

- 1) *What is the current planning status of the site?*
Granted planning permission 28th September 2015 to a housing association for 143 dwellings. Construction has commenced and demolition for dilapidated factory units complete.
- 2) *How does it fit within the overall spatial strategy?*
Canalside urban location with good access to work, retail and recreational facilities to meet Warwick District OAN.
- 3) *In addition to housing provision, are there other benefits that the proposed development would bring?*
Regeneration of the area
- 4) *What are the potential adverse impacts of developing the site? How could they be mitigated?*
None known
- 5) *What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?*
Assumed any have been resolved.
- 6) *Is the site realistically viable and deliverable?*
Yes
- 7) *What is the expected timescale for development and is this realistic?*
Being built

• **H14 – Riverside House**

- 1) *What is the current planning status of the site?*

Currently is the WDC HQ and officers car park. WDC have decided to close the site for economic reasons and relocate to new premises in Leamington yet to be constructed. H14 is in the draft LP DS11

- 2) *How does it fit within the overall spatial strategy?*
Would provide housing within a popular town
- 3) *In addition to housing provision, are there other benefits that the proposed development would bring?*
Relocate council offices to more economic premises closer to the centre of the town. Regeneration of a poorer part of the town and clears away a concrete multi-storey car park.
- 4) *What are the potential adverse impacts of developing the site? How could they be mitigated?*
None other than practical issues and implementation time
- 5) *What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?*
Don't know
- 6) *Is the site realistically viable and deliverable?*
Yes
- 7) *What is the expected timescale for development and is this realistic?*
See WDC.

• **H16 – Court Street**

- 1) *What is the current planning status of the site?*
In the draft LP only
- 2) *How does it fit within the overall spatial strategy?*
Urban location close to all facilities of Leamington. Would have a 40% affordable housing requirement.
- 3) *In addition to housing provision, are there other benefits that the proposed development would bring?*
Potential to help regenerate the south of the town of Leamington and its retail area on a poor carpark adjacent to the railway viaduct close to Leamington station
- 4) *What are the potential adverse impacts of developing the site? How could they be mitigated?*
Don't know
- 5) *What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?*

Don't know

6) *Is the site realistically viable and deliverable?*

Don't know

7) *What is the expected timescale for development and is this realistic?*

Don't know

• **H17 – Garage site, Theatre Street**

1) *What is the current planning status of the site?*

Planning permission granted 19 September 2014 and 24 May 2016 for 39 housing association flats.

2) *How does it fit within the overall spatial strategy?*

Urban town centre location with redundant premises needing regeneration. Good location for housing.

3) *In addition to housing provision, are there other benefits that the proposed development would bring?*

Regeneration.

4) *What are the potential adverse impacts of developing the site? How could they be mitigated?*

Don't know.

5) *What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?*

Don't know.

6) *Is the site realistically viable and deliverable?*

Yes

7) *What is the expected timescale for development and is this realistic?*

See WDC

• **H39 – Opus 40, Birmingham Road, Warwick**

1) *What is the current planning status of the site?*

Planning permission granted 27 July 2015 for 85 dwellings to a housing association.

2) *How does it fit within the overall spatial strategy?*

Good reuse of redundant commercial premises within Warwick close to the A46 giving easy access to Coventry and motorway networks including public transport and Warwick Parkway station.

3) *In addition to housing provision, are there other benefits that the proposed development would bring?*

No comment

- 4) *What are the potential adverse impacts of developing the site? How could they be mitigated?*
Don't know
- 5) *What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?*
Don't know
- 6) *Is the site realistically viable and deliverable?*
Don't know
- 7) *What is the expected timescale for development and is this realistic?*
Building regs applied for so early start expected.

Greenfield

• H01 – Land west of Europa Way

- 1) *What is the current planning status of the site?*
Outline planning permission granted 5 December 2014 for 735 dwellings and site E1 north of Gallows Hill 31 March 2015 for 425 dwellings.
- 2) *How does it fit within the overall spatial strategy?*
Satisfactorily as part of the Warwick Leamington town north of the Harbury Lan/ Gallows Hill albeit on grade 1 and 2 agricultural land.
- 3) *In addition to housing provision, are there other benefits that the proposed development would bring?*
Associated infrastructure related to this scale of development.
- 4) *What are the potential adverse impacts of developing the site? How could they be mitigated?*
Increased traffic pressures particularly at peak times. Traffic mitigation measures proposed are not convincing.
- 5) *What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?*
Some matters are being addressed but full situation is not known.
- 6) *Is the site realistically viable and deliverable?*
Probably.
- 7) *What is the expected timescale for development and is this realistic?*
Not yet known

• H02 – Land south of Harbury Lane (excluding former sewage works)

1) *What is the current planning status of the site?*

The DLP DS11 allocated this site for 1505 dwellings. Planning permissions were granted for Lower Heathcote Farm for 785 dwellings on 19th September 2014 and for Grove Farm ph 1 for 200 dwellings on 29 April 2014 and for ph 2 for 520 dwellings on 20th August 2015. Lower Heathcote and Grove Farm 1 have commenced on site.

Sites south of Harbury Lane have not been accepted by previous local plan examinations, regarding Harbury Lane as the boundary of the towns. From the 2014-based projections now known, where 9,978 planning permission have been granted for a 8,054 FOAN for Warwick. Assuming provision for Coventry is located adjacent to Coventry, inclusion of these sites was not necessary.

In the MDLP the 1505 dwellings has been increased to 1605 by reference to 620 plus 985 included in commitments (see H02 on page 31 in appendix B to the MDLP). No reference to made to where the extra 100 was planned.

This site is part of Bishop's Tachbrook Parish, but the change was made without any consultation with the Parish Council and from the latest projections is certainly not necessary. The lack of consultation is regrettable on this important site, particularly in view of the Bishop's Tachbrook Neighbourhood Plan being developed at the same time of which the District Council was fully aware, and which requires that consultation.

It turns out that the intention is that land reserved on the Lower Heathcote site for playing fields related to these developments and which is adjacent to the country park is the target site for these 100 additional dwellings. Given that the 2014 projections now demonstrate that the Warwick OAN is now 8,054 and that almost 2000 additional dwelling sites have already been granted permission and that this site is remote to Coventry so is not a serviceable site for Coventrians, there is no need for this modification to the DLP.

2) *How does it fit within the overall spatial strategy?*

The additional 100 dwelling site in the MDLP does not fit with the overall spatial strategy at all. It does not meet DS4 a), b) or)f).

3) *In addition to housing provision, are there other benefits that the proposed development would bring?*

Nothing additional to those provided by the permissions already granted. It loses one of the benefits that had already been gained.

4) *What are the potential adverse impacts of developing the site? How could they be mitigated?*



The playing field site that has planning permission is part of the valued Tachbrook Valley and while a large number of the 1,505 dwellings already granted permission will cover much of the slopes beyond the shrub line to the sides of the brook in the centre of the photo, if more housing is permitted it would further reduce the quality of this landscape. This playing field should be seen as part of the mitigation necessary to reduce the impact of the development already granted.

5) *What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?*

The site is sloping so would add additional external works costs to the development and the closer development gets to the brook, the greater the risk to the water quality in the brook due to human intervention.

6) *Is the site realistically viable and deliverable?*
No further comment.

7) *What is the expected timescale for development and is this realistic?*
If approved, it would presumably complete with the main developments.

• **H03 – East of Whitnash/South of Sydenham**

No comments to make

• **H04 – Red House Farm**

No comments to make

• **H44 – North of Milverton**

No comments to make

• **H45 – Hazelmere and Little Acre (Golf Lane), Whitnash**

No comments to make

• **H46A – Gallows Hill**

1) *What is the current planning status of the site?*

There are 2 parts to this site.

H46Aa An application was made for 450 dwellings and refused by WDC. At appeal the Secretary of state called the application in and decided to allow the appeal as the district did not have a 5 year housing land supply in place.

H46Ab To the west of H46Aa an additional piece of land, known locally as Strawberry Fields, has been added to H46Aa to bring the total number up to 630 dwellings. No planning application has been made yet.

In the modification proposals these sites should have been kept separate.

2) *How does it fit within the overall spatial strategy?*

H46Ab does not fit with the overall spatial strategy because as already stated the OAN for Warwick has been met and the need for Coventry is closer to Coventry. The quantity of new housing in this part of the District will exacerbate the existing traffic problems within Warwick.

3) *In addition to housing provision, are there other benefits that the proposed development would bring?*

No.

4) *What are the potential adverse impacts of developing the site? How could they be mitigated?*

This site is an important heritage site to keep as rural area with an agricultural purpose. The Asps development south of the site was careful to keep development away from the Banbury Road by retaining fields along the Banbury road as part of the special entrance to the Historic Town of Warwick. The same philosophy should apply to this site as it is a visually valuable piece of field landscape as part of the grand entrance to Warwick. Mitigation would not resolve this matter.

5) *What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?*

The site slopes down to the Banbury road and the bottom half of the field is subject to frequent local flooding. Drainage may be difficult due to the nature of the clay subsoils.

6) *Is the site realistically viable and deliverable?*

No further comment

7) *What is the expected timescale for development and is this realistic?*

Having regard to the large amount of development already underway it is probable that this site would not commence until near the end of the plan programme. By that time, the need for any further housing would have become known.

- **H46B – The Asps**

- 1) *What is the current planning status of the site?*

An application was made for 450 dwellings and refused by WDC. At appeal the Inspector recommended that the appeal be dismissed but the Secretary of state called the application in and decided to allow the appeal as the district did not have a 5 year housing land supply in place.

No further comment need be made as planning permission has been granted despite the appeal result.